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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON DIVISION**

SAWHORSE ENTERPRISES, INC.)
)
Plaintiff,)
) Case No. 3:12-cv-06811(FLW)(TJB)
v.)
)
CHURCH & DWIGHT CO., INC.,)
)
Defendant.)
)

STIPULATION OF MOTION PRACTICE AND MOTION DATE

This Stipulation is made and entered into as of January 16, 2013 by and between plaintiff Sawhorse Enterprises, Inc. (“Sawhorse” or “Plaintiff”) and defendant Church & Dwight Co., Inc. (“Church & Dwight” or “Defendant”).

WHEREAS, Defendant Church & Dwight noticed its Motion to Dismiss Plaintiff’s First Amended Complaint and to Stay Discovery Pending Resolution of the Motion for February 4, 2013;

WHEREAS, the parties have conferred and agreed to move the motion day for Church & Dwight’s Motion to Dismiss Plaintiff’s First Amended Complaint and to Stay Discovery Pending Resolution of the Motion to February 19, 2013;

WHEREAS, Sawhorse intends to file a Motion for Early Discovery based upon Plaintiff's principal's medical condition;

WHEREAS, Sawhorse intends to notice its Motion for Early Discovery for February 19, 2013;

IT IS HEREBY STIPULATED AND AGREED between counsel for the parties that the following schedule shall govern Sawhorse's and Church & Dwight's respective motions.

- 1) January 22, 2013 - Date for Sawhorse to submit and serve its proposed Motion for Early Discovery;
- 2) January 29, 2013 - Date for Sawhorse's Opposition to Church & Dwight's pending Motion to Dismiss the First Amended Complaint and Stay Discovery Pending Resolution of That Motion;
- 3) February 5, 2013 - Date for Church & Dwight's opposition to Sawhorse's Proposed Motion for Early Discovery;
- 4) February 13, 2013 - Date for Church & Dwight's reply in further support of its Motion to Dismiss the First Amended Complaint and Stay Discovery Pending Resolution of That Motion; and Date for Sawhorse's reply in further support of its Proposed Motion for Early Discovery; and
- 5) February 19, 2013 - *return date for* ~~Motion day for~~ (i) Church & Dwight's Motion to Dismiss the First Amended Complaint and Stay Discovery Pending Resolution of That Motion and (2) Sawhorse's Proposed Motion for Early Discovery.

s/ Maureen V. Abbey
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IT IS SO ORDERED:

Date: 1/22/13

Freda L. Wolfson
Honorable Freda L. Wolfson
U.S. District Court Judge